

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNION DE PERIODISTAS, ARTES
GRAFICAS Y RAMAS ANEXAS

Civil No. 08-1357

Plaintiff

Enforcement of Arbitration Award

v.

Claim for Unpaid Wages

The San Juan Star Company

Defendants

**MOTION FOR LEAVE TO FILE
DOCUMENTS IN SPANISH LANGUAGE**

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, UNION DE PERIODISTAS ARTES GRAFICAS Y RAMAS ANEXAS (“UPAGRA”), represented in this case by the undersigned counsel and very respectfully **STATES, ALLEGES** and **PRAYS** as follows:

1. Today, UPAGRA is filing a Motion to Show Cause and Request the Execution of Summons by Edict.
2. Said motion includes as an exhibit, a sworn statement in the Spanish language signed by Pedro Luis Hornedo Colón, who was hired to serve the summons.
3. Therefore, UPAGRA very respectfully requests leave to file certified English translations of the exhibit included with the motion, which was submitted to the Honorable Court in its original Spanish version.
4. Accordingly, UPAGRA is currently requesting certified translations of this sworn statement in order to submit it in compliance with this Honorable Court’s Local Rules.

5. In order to finish the process of completing certified translation of this document, UPAGRA very respectfully requests an extension of time of 15 days.

WHEREFORE, it is very respectfully requested from this Honorable Court to grant UPAGRA an extension of time of 15 days to submit certified English translations of the exhibit included with its Complaint.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 5th day of February, 2010.

s/ **Pedro J. Santana González**
PEDRO J. SANTANA GONZALEZ
Attorney Bar Number: 218013
Attorney for Plaintiff
SIMONET SIERRA LAW OFFICE
Maramar Plaza
101 Ave. San Patricio, Suite 1120
Guaynabo, PR 00968
Tel. (787) 620-5300
Fax (787) 620-5305
E-mail: psantana@llvslaw.com